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INTERVENTION

BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL, Arizona Corporation Commission
CHAIRMAN

DOCKETED

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COMMISSIONER SEP 16 2002

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COMMISSIONER DOCKETED BY

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IN THE MATTER OF THE APPLICATION OF
CITIZENS COMMUNICATIONS COMPANY,
ARIZONA GAS DIVISION, FOR APPROVAL
OF AN INCREASE IN RATES.

Docket No. G-01032A-02-0598

RUCO'S APPLICATION TO INTERVENE

I.

The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby applies to the Arizona Corporation Commission ("Commission") for an Order granting it leave to intervene in the above-captioned proceeding.

II.

RUCO was established by the enactment of Arizona Revised Statutes, Section 40-461, *et seq.*, for the purpose of representing residential utility consumers in matters before the Commission concerning regulated public service corporations.

III.

Arizona Revised Statutes, Section 40-464.A.2., specifically provides that the Director of RUCO may do the following:

Prepare and present briefs, arguments, proposed rates or orders and intervene or appear on behalf of residential utility consumers before hearing officers and the Corporation Commission as a party in interest and also participate as a party in interest pursuant to Section 40-254 in proceedings relating to rate making or rate design and involving public service corporations.

1 IV.

2 The residential utility consumers of Citizens Communications Company, Arizona
3 Gas Division, will be directly and substantially affected by a Decision or Order of the
4 Commission in this matter, therefore, it is necessary and proper that RUCO intervene in
5 the proceeding.

6 V.

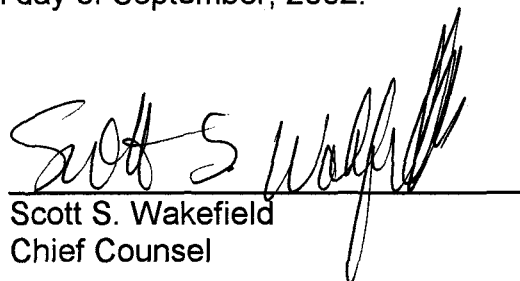
7 In order to fulfill its statutory obligation to protect the residential utility consumers of
8 this State, RUCO must thoroughly examine the materials presented by the Company, and
9 must cross-examine witnesses appearing on behalf of the Company and any other parties.
10 Additionally, RUCO may present testimony and exhibits of its own in any hearings
11 conducted by the Commission in this matter.

12 VI.

13 The name, mailing address, and telephone number of the person upon whom
14 service of all documents is to be made is,

15 Scott S. Wakefield, Chief Counsel
16 Residential Utility Consumer Office
17 1110 W. Washington, Suite 220
Phoenix, Arizona 85007
(602) 364-4839

18 RESPECTFULLY SUBMITTED this 16th day of September, 2002.

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21 
22 Scott S. Wakefield
Chief Counsel
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1 AN ORIGINAL AND TEN COPIES
2 of the foregoing filed this 16th day
3 of September, 2002 with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington
6 Phoenix, Arizona 85007

5 COPIES of the foregoing hand delivered/
6 mailed this 16th day of September, 2002 to:

7 Lyn Farmer
8 Chief Administrative Law Judge
9 Hearing Division
10 Arizona Corporation Commission
11 1200 West Washington
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10 Christopher Kempley, Chief Counsel
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20 By Cheryl Fraulob
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